



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	NOFA-NY Certified Organic, LLC
Est. Number:	N/A
Physical Address:	840 Upper Front Street, Binghamton, NY 13005
Mailing Address:	Same
Contact & Title:	Carol King, Co-Administrator Lisa Engelbert, Co-Administrator
E-mail Address:	certifiedorganic@nofany.org
Phone Number:	607-724-9851
Auditor(s):	Martin Friesenhahn, Lead Auditor & Dave Hildreth, Auditor
Program:	USDA National Organic Program (NOP)
Audit Date(s):	February 8 – June 14, 2007
Audit Identifier:	NP7039BBB
Action Required:	Yes
Audit Type:	Surveillance - Accreditation Renewal Audit
Audit Objective:	To verify continuing compliance to the audit criteria.
Audit Criteria:	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; Updated September 11, 2006
Audit Scope:	The NOFA-NY Certified Organic, LLC quality manual including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	NOFA-NY Certified Organic, LLC Office in Binghamton, NY; Cobblestone Valley Enterprises, LLC in Preble, NY; New Hope Mills in Auburn, NY; and the Gillie Farm in Memphis, NY.

NOFA-NY Certified Organic, LLC is the organic certification program that is owned by NOFA-NY. NOFA-NY Certified Organic, LLC was accredited as a certifying agent on April 29, 2002, to the National Organic Program (NOP). The NOP website does not list the scope of wild crops for NOFA-NY Certified Organic, LLC; however, pertinent review documents, approval documents, and audit reports show that NOFA-NY Certified Organic, LLC was reviewed for and approved under the scope of crops, wild crops, livestock, and handling operations. NOFA-NY Certified Organic, LLC currently has 496 certified clients with 56 additional clients in the application process. The 2007 Certified and In-Process Producer Listing for NOFA-NY Certified Organic, LLC listed 263 crops, 231 livestock, 12 wild crops, and 46 handling operations certified to the NOP Standards or in the application process. The majority of clients are certified in the State of New York with some clients in Pennsylvania, Connecticut, New Jersey, California, and Ohio.



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The 5 Year Accreditation Audit process started on February 8, 2007 with a review of the documents submitted by NOFA-NY Certified Organic, LLC and concluded with the on-site surveillance audit which was conducted on June 12 – 14, 2007.

NOFA-NY Certified Organic, LLC is currently only applying the NOP Standards and is recognized by the Conseil des Appellations Agroalimentaires du Quebec (CAAQ) due to being an ISO Guide 65 accredited company. An ISO Guide 65 surveillance audit was conducted along with the NOP on-site accreditation renewal audit.

The application and files are reviewed by staff prior to assigning an inspector. The inspectors consist of staff and contract inspectors with the majority of inspections completed by the staff inspectors. The final review and decision for certification of clients is made by at least one Final Reviewer. This is a recent change from the decision making process which consisted of at least two members from the Certification Review Committee. The review process and the reviewers have not changed only that the final decision could be made with one Final Reviewer instead of at least two members of the Certification Review Committee.

The audit included observations of two renewal inspections and one demonstration inspection by NOFA-NY Certified Organic, LLC. The operation for the producer and livestock inspections included organic hay, pasture, field crops, strawberries, broiler, turkey, and dairy production. The processing facility was certified for repackaging organic flours, pasta, grains, mixing, and packaging and repackaging pancake and baking mixes. The demonstration inspection included a review of the wild crop operation of black walnuts.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that NOFA-NY Certified Organic, LLC is currently operating in compliance to the audit criteria except as noted below. Two (2) non-compliances were identified during the audit.

NP7039BBB.NC1 — NOP § 205.403 (c)(1-3) On-site inspection – Verification of information states, “The on-site inspection of an operation must verify: (1) The operation’s compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan... accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; and (3) That prohibited substances have not been and are not being applied to the operation....” *During the observation of the livestock and crop inspection it was determined that the inspector did not adequately review two areas of the strawberry production. The field records were not reviewed to determine the application dates of the compost and manure on the strawberry fields. In addition, the records were not reviewed to determine the organic status or source of the strawberry plants planting stock.*



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NP7039BBB.NC2 – NOP §205.662(a)(1-3) requires the certifying agent to include: (1) the description of each non-compliance; (2) the facts upon which the notification of non-compliance is based; (3) the date by which the certifying operation must rebut or correct each non-compliance and submit supporting documentation of each such correction when correction is possible; and (b) requires the certifying agent to send the certified operation a written notification of non-compliance resolution when the certified operation demonstrates that each non-compliance has been resolved. *NOFA-NY Certified Organic, LLC has procedures in place for when non-compliances are issued. The Determination Letters to some of the certified operations included a category for Committee Comments/Recommendations listing some deficient areas and a timeframe for these to be submitted in writing to NOFA-NY Certified Organic, LLC. Some of these issues listed were determined during the audit to be minor non-compliances to the NOP Rule which would then have required the written notifications of non-compliance and written notices of resolution. However, the issues listed on this letter for the certified operation to address were not always clearly identified and the timeframes for submitting corrective actions were not always listed. In addition, the written notifications of non-compliance resolutions were not submitted to the certified operations since NOFA-NY Certified Organic, LLC did not consider these issues as minor non-compliances.*